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June 21, 2022

**Via ECF**

Judge Eric N. Vitaliano  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Lieberman v. C.A. Goldberg, PLLC, et al.**  
**1:21-cv-05053-ENV-RER**

Dear Judge Vitaliano:

I represent the Plaintiff in the above-referenced action. I write jointly with counsel for Defendants in accordance with the Order of June 8, 2022 directing the parties to propose a joint briefing schedule for (1) Plaintiff's Rule 12(b)(6) motion to dismiss Defendant C.A. Goldberg PLLC's counterclaim for Faithless Servant and (2) Defendants' motion for summary judgment on Plaintiff's claim for pregnancy discrimination and Defendant C.A. Goldberg's counterclaim for Faithless Servant. The parties propose that each motion be filed separately on the following schedule:

July 8, 2022	Initial motion papers to be filed
August 17, 2022	Opposition papers to be filed
September 12, 2022	Replies to be filed

The parties thank the Court for its consideration of this matter.

Respectfully,

  
BRIAN HELLER

cc: All counsel – via ECF